

FILED

MAY 20 2024

An

2024R00057

AT 8:30 12:30 P^M

UNITED STATES DISTRICT COURT CLERK, U.S. DISTRICT COURT - DNJ
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	: Hon. William J. Martini
	: :
v.	: Criminal No. 24- 344 (WJM)
	: :
EVGENIY DOROSHENKO,	: 18 U.S.C. § 1030(a)(2)(C)
a/k/a "Eugene Doroshenko"	: 18 U.S.C. § 1343
a/k/a "FlankerWWH," and	: 18 U.S.C. § 2
a/k/a "Flanker"	: :

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark charges:

COUNT ONE
(Wire Fraud)

1. At all times relevant to this Indictment:

a. Defendant EVGENIY DOROSHENKO, a/k/a Eugene Doroshenko," a/k/a "FlankerWWH," and a/k/a "Flanker" ("DOROSHENKO") was a citizen and resident of Russia.

b. An "access broker" was an individual who acquired and sold unlawful access to victim computer systems. Typically, access brokers sold this access to individuals committing various types of computer-related crimes, such as business email compromises, unlawful exfiltration of data, and ransomware attacks.

c. "Cybercrime Forums" were online forums where, either overtly through public messages or covertly through private messages, cybercriminals promoted and facilitated a wide variety of criminal activities including, among other activities, computer hacking and trafficking in stolen data.

d. Cybercrime Forum-1 was a Russian language Cybercrime Forum accessible through the dark web, meaning it was accessible only through The Onion Router (“Tor”) network, which anonymized the Internet Protocol (“IP”) addresses of its underlying servers.

e. Victim-1 was a company with headquarters in Bergen County, New Jersey.

Overview of the Wire Fraud Scheme

2. From at least as early as February 25, 2019 through on or about the date of this Indictment, in the District of New Jersey and elsewhere, the defendant,

EVGENIY DOROSHENKO,
a/k/a “Eugene Doroshenko,”
a/k/a “FlankerWWH,”
a/k/a “Flanker

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud victims, including Victim-1, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as set forth more fully below.

Object of the Scheme

3. The object of the scheme was for DOROSHENKO to profit unlawfully by obtaining unauthorized access to victim computer networks and then acting as an access broker by selling the unauthorized access to others over Cybercrime Forum-1.

Manner and Means of the Scheme

4. It was part of the scheme that:

a. DOROSHENKO unlawfully obtained access credentials to victim computer networks, including Victim-1's computer network.

b. DOROSHENKO used the unlawfully obtained access credentials to gain unauthorized access to victim computer networks, including Victim-1's computer network.

c. DOROSHENKO then sold and offered to sell access to victim computer networks, including Victim-1's computer network, over Cybercrime Forum-1.

Execution of the Scheme

5. On or about January 11, 2024, in Bergen County, in the District of New Jersey, and elsewhere, for the purpose of executing and attempting to execute this scheme and artifice to defraud, the defendant,

EVGENIY DOROSHENKO,
a/k/a "Eugene Doroshenko,"
a/k/a "FlankerWWH," and
a/k/a "Flanker,"

did knowingly transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce certain writings, signs, signals, pictures, and sounds, namely, DOROSHENKO, while located in Russia, remotely connected to the computer network of Victim-1 in the District of New Jersey.

In violation of Title 18, United States Code, Section 1343 and Section 2.

COUNT TWO
(Computer Fraud)

1. The allegations in paragraphs 1, 3, and 4 of Count One of this Indictment are re-alleged here.

2. From on or about January 11, 2024 through on or about January 17, 2024, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

EVGENIY DOROSHENKO,
a/k/a “Eugene Doroshenko,”
a/k/a “FlankerWWH,” and
a/k/a “Flanker,”

intentionally accessed and exceeded authorized access to a protected computer, that is the computer network of Victim-1, used in and affecting interstate and foreign commerce, and communication, and thereby obtained information from a protected computer, for the purpose of commercial advantage and private financial gain, in furtherance of a criminal and tortious act in violation of the laws of the United States, including wire fraud, in violation of Title 18, United States Code, Section 1343, and the value of the information exceeded \$5,000.

In violation of Title 18, United States Code, Sections 1030(a)(2)(C) and (c)(2)(B)(i-iii) and Section 2.

FORFEITURE ALLEGATION

1. Upon conviction of either of the offenses charged in this Indictment, the defendant,

EVGENIY DOROSHENKO,
a/k/a "Eugene Doroshenko,"
a/k/a "FlankerWWH," and
a/k/a "Flanker,"

shall forfeit to the United States:

a. pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i), any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of the offenses charged in this Indictment; and

b. pursuant to Title 18, United States Code, Section 1030(i), all right, title, and interest of the defendant in any personal property that was used or intended to be used to commit or to facilitate the commission of the offenses charged in this Indictment.

SUBSTITUTE ASSETS PROVISION

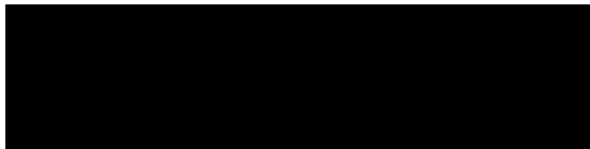
2. If any of the above-described forfeitable property, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p) (as incorporated by Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 1030(i), and Title 18, United States Code, Section 982(b)), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A TRUE BILL



Philip R. Sellinger

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: Cr. 24-344 (WJM)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**EVGENIY DOROSHENKO,
a/k/a “Eugene Doroshenko,”
a/k/a “FLANKERWWH,” and
a/k/a “Flanker”**

INDICTMENT FOR

18 U.S.C. § 1343
18 U.S.C. § 1030(a)(2)(C)
18 U.S.C. § 2



**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**DAVID E. MALAGOLD
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
(973) 645-6103**
